

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : 3:13-CR- 237
:
v. :
:
CHRISTA POLICARE, : (Judge Mannion)
:
Defendant. :
:

FILED
SCRANTON

OCT 24 2013

I N F O R M A T I O N

Count 1

18 U.S.C. § 371

(Conspiracy to Possession with Intent to Deliver and Delivery of
Controlled Substance Analogues)

PER
DEPUTY CLERK

Beginning on or about the first day of November 1, 2012 , the
exact date being unknown, and continuing thereafter until on or about
July 10, 2013, within the Middle District of Pennsylvania, and
elsewhere, the defendant,

CHRISTA POLICARE,

did knowingly, intentionally and unlawfully combine, conspire,
confederate and agree together with Todd Morgans and other persons
both known and unknown to commit certain offenses against the United
States, namely: did unlawfully, knowingly and intentionally combine,
conspire, confederate and agree together with each other and with other

persons both known and unknown to the grand jury to commit the following offenses against the United States: that is, to knowingly, intentionally, and unlawfully manufacture, distribute, and possess with the intent to distribute a mixture or substance containing a detectable amount of alpha-pyrolidinopentiophenone (a-pvp), a controlled substance analogue as defined in 21 U.S.C. § 802(32), with intent for human consumption as provided in 21 U.S.C. § 813, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and their co-conspirators sought to accomplish the objectives of the conspiracy included, among others, the following:

1. The defendant and/or her co-conspirators acquired and possessed a controlled substance analogue with intent to distribute the substance.
2. The defendant and/or her co-conspirators arranged for the sales of the controlled substance analogue.

3. The defendant and/or her co-conspirators maintained a location for the purpose of selling to the controlled substance analogues to others.

4. The defendant and/or her co-conspirators accepted money or other valuable consideration in exchange for the controlled substance analogues.

OVERT ACTS

In furtherance of this conspiracy, and to effect and accomplish the objects of the conspiracy, the defendant and/or her co-conspirators did commit and cause to be committed the following overt acts, among others, in the Middle District of Pennsylvania, and elsewhere:

1. The defendant and/or her co-conspirators purchased bulk quantities of the alpha-pyrolidinopentiophenone (α -pvp), a Schedule I controlled substance analogue within the meaning of Title 21 U.S.C. § 802(32).
2. The defendant and/or her coconspirators repackaged the controlled substance analogue into smaller packages for the purpose of selling the substance.

3. The defendant and/or her co-conspirators arranged for the sales of the controlled substance analogue with others at 217 Liberty Street, West Pittston, Luzerne County, PA.
4. The defendant and/or her co-conspirators received money and other valuable consideration in exchange for the controlled substance analogues.

All in violation of Title 18, United States Code, Section 371.

Forfeiture Allegation

The allegations contained in Count One of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853 and Title 18, U.S.C., Section 371.

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, the defendant, Christa Policare, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

- a. Real property located at 217 Liberty Street, West Pittston, Luzerne County, Pennsylvania;
- b. The contents of Bank of America Bank Account #XXXX-XXXX-3859, a bank account in the name of Todd Morgans;
- c. The contents of Bank of America Account# XXXX-XXXX-5776, a bank account in the name of Todd Morgans, and;

d. U.S. Currency in the amount of approximately \$40,000 and 1 silver bar seized from 217 Liberty Street, West Pittston, PA.

19. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Date: 10.22.13

5/ Peter J. Smith
PETER J. SMITH
UNITED STATES ATTORNEY